

MEMORANDUM

DATE	May 14, 2009	PROJECT NO.	09084
TO	Mimi Morris	PROJECT NAME	26 Robertson Blvd., Chowchilla
OF	California Cultural & Historical Endowment California State Library 900 N Street, Suite 390 Sacramento, CA 95814	FROM	Gretchen Hilyard
CC	File	VIA	Email

REGARDING :

CCHE GRANT EVALUATION ASSISTANCE FOR 26 ROBERTSON BLVD., CHOWCHILLA

INTRODUCTION

This memorandum concerning the Dodge Brothers Garage at 26 Robertson Boulevard, Chowchilla, California (historically known as the Chowchilla Garage and Machine Works) has been prepared by Page & Turnbull, Inc. for the California Cultural and Historical Endowment (CCHE). The purpose of this memo is to assist CCHE with the grant evaluation for the proposed project for the Chowchilla Heritage Welcome Center and to evaluate the proposed project according to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

This memorandum is based on a review of all available documentation and communication about the proposed project as provided by the CCHE, including:

- the original grant application dated March 2007;
- the Final Environmental Impact Report and Response to Comments for the Chowchilla Heritage Welcome Center (December 5, 2008);
- the Re-circulated Draft Focused Environmental Impact Report for the Chowchilla Heritage Welcome Center Project (October 6, 2008);
- DPR 523A and B forms created for 26 Robertson Blvd. as part of the 2006 Chowchilla Historic Resources Reconnaissance Survey Final Report (Appendix 4.1-A of the EIR);
- letters between the project sponsor and the CCHE;

- a packet of scanned documents dated January 12, 2009 from the Project's Lead Agency, including the Notice of Determination, Certification of Final EIR and Statement of Overriding Considerations, Mitigation Monitoring and Reporting Requirements, Findings for the project and others;
- December 22, 2008 letter to the City of Chowchilla from the California State Office of Historic Preservation;
- excerpts from the February 3, 2009 and November 19, 2009 CCHE Board Meeting transcripts;
- and site observations and photographs taken by Page & Turnbull during an April 2009 site visit.

The Dodge Brothers Garage was built in 1912 as the Chowchilla Garage and Machine Works and was the first service station in Chowchilla. The building is located along Robertson Boulevard, the main thoroughfare into Chowchilla (also known as California Interstate Highway 233). According to the EIR, "the subject property was among the first properties developed in the City of Chowchilla, and the building was among the few oldest buildings still standing in the City."¹ The building was previously identified in a 2006 reconnaissance survey for potential listing in the Chowchilla Local Register of Heritage Resources. Although the building is in fair physical condition, it retains sufficient historic integrity to convey its significance.

The one-story commercial building is located on the northwest corner of Robertson Boulevard and Front Street, occupying lots 22 and 23 of block 15 in the City of Chowchilla. The primary façade faces southeast onto Robertson Boulevard and features three structural bays separated by ornamental brick pilasters. The building was designed in the Classical Revival style and currently stands vacant.

STATUS OF EXISTING BUILDING AS A HISTORIC RESOURCE

The following section provides an evaluation of the property for its eligibility for listing in the National Register of Historic Places, the California Register of Historical Resources, and the Chowchilla Local Register of Heritage Resources. A list of the

property's character-defining features and an evaluation of integrity has also been included in this section.

National Register of Historic Places

The National Register of Historic Places is the official federal list of districts, sites, buildings, structures and objects significant in American history, architecture, archeology, engineering, and culture. These resources contribute to an understanding of the historical and cultural foundations of the Nation at the national, state, or local level. Typically, resources over fifty years of age are eligible for listing in the National Register if they meet any one of the four significance criteria and if they retain sufficient historic integrity to convey that significance. However, resources under fifty years of age can be determined eligible if it can be demonstrated that they are of "exceptional importance." National Register criteria are defined in depth in *National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation*.

The National Register has four basic criteria under which a resource can be considered eligible for listing. These criteria are:

Criterion A (Event): Properties associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B (Person): Properties associated with the lives of persons significant in our past;

Criterion C (Design/Construction): Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant distinguishable entity whose components lack individual distinction; and

Criterion D (Information Potential): Properties that have yielded, or may be likely to yield, information important in prehistory or history.

A resource can be considered significant on a national, state, or local level to American history, architecture, archaeology, engineering, and culture.

Criterion A (Event)

The Dodge Brothers Garage does not appear to be significant under National Register Criterion A (Event). Although the building is associated with events that have made a significant contribution to patterns of local history, this association does not rise to the level of significance necessary for listing in the National Register.

Criterion B (Person)

The Dodge Brothers Garage does not appear to be significant under National Register Criterion B (Person). Research has failed to uncover any intimate associations with prominent persons that would justify its inclusion in the National Register under this criterion.

Criterion C (Design/Construction)

The Dodge Brothers Garage does not appear to be significant under National Register Criterion C (Architecture). Although the building does embody the characteristics of a distinct building type and period, it does not rise to the level of significance necessary for listing in the National Register.

Criterion D (Information Potential)

The analysis of the Dodge Brothers Garage for eligibility under National Register Criterion D (Information Potential) is beyond the scope of this memorandum.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-eligible properties are automatically listed on the California Register.² Properties can also be nominated to the California Register by local governments, private organizations or citizens. This includes properties identified in historical resource surveys with California Historic Resource Status Codes of 1 to 5 and resources designated as local landmarks through city or county ordinances. The

evaluative criteria used by the California Register for determining eligibility are closely based on those developed for use by the National Park Service for the National Register. In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria:

Criterion 1 (Event): Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2 (Persons): Resources that are associated with the lives of persons important to local, California, or national history.

Criterion 3 (Architecture): Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.

Criterion 4 (Information Potential): Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California or the nation.

Criterion 1 (Event)

The Dodge Brothers Garage appears eligible under California Register Criterion 1 (Events) at the local level. It is associated with important patterns in local history, namely the early commercial development of the City of Chowchilla. The Dodge Brothers Garage was one of the earliest buildings constructed in Chowchilla and is one of only a few extant historic properties that represent the city's early commercial development. It was the first building of its type constructed in the 1910s to accommodate the emerging automobile culture and helped spur the development of other service stations and related commercial buildings in downtown Chowchilla. The commercial development of Chowchilla would not have been possible without the Dodge Brothers Garage, as it provided the first automobile service to the local community as well as people travelling through the Central Valley at this time.

Criterion 2 (Persons)

The Dodge Brothers Garage does not appear eligible under California Register Criterion 2 (Persons). Research has failed to uncover any intimate associations with prominent persons that would justify its inclusion in the California Register under this criterion.

Criterion 3 (Architecture)

The Dodge Brothers Garage appears eligible under California Register Criterion 3 (Architecture) at the local level as a building that “embodies the distinctive characteristics of a type and period.” The Dodge Brothers Garage is a rare surviving example of early twentieth century commercial architecture in Chowchilla and is significant for its association with the development of transportation in the area.

Criterion 4 (Information Potential)

The analysis of the Dodge Brothers Garage for eligibility under California Register, Criterion 4 (Information Potential) is beyond the scope of this memorandum.

Chowchilla Local Register of Heritage Resources

According to the Chowchilla Municipal Code Criteria for evaluation and nomination of historic resources:

Any improvement, building, portion of buildings, structures, signs, features, archaeological sites, scenic areas, views, vistas, places, areas, landscapes, trees, or other natural objects or objects of scientific, aesthetic, educational, political, social, cultural, architectural, or historical significance can be designated a heritage resource by the city council and any area within the city may be designated a heritage resource district by the city council pursuant to provisions of this chapter if it possesses integrity of location, design, setting, materials, workmanship, feeling, and association, and meets any of the following National Register of Historic Places criteria:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage;

Criterion B: It is identified with persons or events significant in local, state, or national history;

Criterion C: It embodies distinctive characteristics of a style, type, period, or method of construction, or represents the work of an important creative individual, or possesses high artistic value;

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.³

The Dodge Brothers Garage was recommended as eligible for the Local Register as part of the Chowchilla Historic Resources Reconnaissance Survey completed by consultant Sierra Valley Cultural Planning in 2006. This report determined that the Dodge Brothers Garage Building was eligible for the Chowchilla Local Register of Heritage Resources under Criterion A as one of the few remaining commercial buildings in the city of Chowchilla and under Criterion C as a good example of early 20th century commercial architecture in Chowchilla. Page & Turnbull agrees with the findings of this survey report under the Local Register evaluation, however we do not agree with the findings of this survey report under the California Register evaluation (see California Register section above for further information).

Character-Defining Features

For historic resources, the character-defining features are those prominent or distinctive aspects, qualities, or characteristics that contribute significantly to a resource's character. The character-defining features best convey a resources historical significance. The character-defining features of the Dodge Brothers Garage are summarized in the list below:

- Rectangular plan
- Orientation facing Robertson Boulevard.
- Brick cladding, including ornamental brickwork, on the primary façade
- Truss roof
- Stepped parapets
- 3 bay configuration of the primary façade
- Clerestory windows and storefront openings on the primary façade
- Wood-sash windows and arched openings on the rear façade
- Central industrial door and cement lintel on rear facade

Integrity

To qualify under one of the four aforementioned California Register Criteria, a resource must also possess historic integrity, which is defined by the National Park Service as “the ability of a resource to convey its significance.”

The process of determining integrity is similar for both the California Register and the National Register. The same seven variables or aspects that define integrity—location, design, setting, materials, workmanship, feeling and association—are used to evaluate a resource’s eligibility for listing in the California Register and the National Register.

According to the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, these seven characteristics are defined as follows:

Location is the place where the historic property was constructed.

Design is the combination of elements that create the form, plans, space, structure and style of the property.

Setting addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building/s.

Materials refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history.

Feeling is the property’s expression of the aesthetic or historic sense of a particular period of time.

Association is the direct link between an important historic event or person and a historic property.

There is a critical distinction between the two registers, however, and that is the degree to which a property can retain integrity and still be considered eligible for listing.

According to the California Office of Historic Preservation:

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for

the California Register if it maintains the potential to yield significant or historical information or specific data.⁴

The Dodge Brothers Garage has been vacant for many years and, as noted in the EIR, its condition has been compromised due to deferred maintenance. However, it is important to note that condition is not a relevant factor in determining if a building retains sufficient historic integrity to convey its significance according to the seven aspects of integrity outlined above, except in the case of materials, which may be compromised due to poor condition.

The Dodge Brothers Garage remains on its original site and in its original orientation facing Robertson Boulevard and therefore retains integrity of location.

The building has undergone few alterations over time and historic photographs indicate that the building retains its historic form, plan, structure, and style, and therefore retains integrity of design.

Sanborn maps indicate that the property was originally part of a commercial district that included buildings of similar scale and early twentieth century aesthetic as the Dodge Brothers Garage. For example, other buildings along Robertson Boulevard included a movie theater, post office, stage depot, hotel and public library. Over time, these buildings have been removed and replaced with newer buildings or have remained undeveloped as vacant lots. Much of the neighborhood context has been lost through the removal of similar buildings within the downtown commercial district. The Dodge Brothers Garage does appear to retain its site specific context, including the building's orientation to Robertson Boulevard, overall lot size and site plan, as well as a large historic tree to the northeast of the primary façade, however the significant loss of the neighborhood context has compromised the overall setting of the building and therefore, the building does not retain integrity of setting.

Although some of the exterior brick has deteriorated due to the poor condition of the building, sufficient quantities of brick and other historic materials remain for the building

to retain integrity of materials.

The building also shows physical evidence of its construction and craftsmanship, as evident in its original brick work and detailing, and therefore retains integrity of workmanship.

The Dodge Brothers Garage still expresses its aesthetic as an early twentieth century commercial property and evokes a sense of a past time and place. The building reflects its design, materials, workmanship, original lot size, location, orientation, and therefore retains integrity of feeling.

The building was reused for non-transportation functions and has been vacant for many years. The direct link between the property and its association with the automotive industry and the early commercial development of Chowchilla is no longer present and the building does not retain integrity of association.

In summary, the Dodge Brothers Garage retains integrity of location, design, materials, workmanship, and feeling, whereas the building's integrity of setting and association have been compromised. Overall, the building retains sufficient integrity to convey the significance of its association with the early commercial development of Chowchilla and as an example of twentieth century commercial architecture.

Summary

Page & Turnbull's evaluation concludes that the Dodge Brothers Garage is eligible for the California Register under Criterion 1 (Event) for its association with the early commercial development of Chowchilla and Criterion C (Architecture) as an example of early twentieth century commercial architecture. We also conclude that the building is eligible for the Local Register for Criterion A for its association with early commercial development in Chowchilla and Criterion C as a rare surviving example of early twentieth century commercial architecture.

Previous documentation of the property as part of the Chowchilla Historic Resources Reconnaissance Survey, states that the building is eligible for listing in the Local Register under Criterion A (Event) and Criterion C (Architecture). This same survey recommends that the building is not eligible for the California Register due to lack of sufficient integrity. It is our understanding that this survey has not been endorsed by the City Council and therefore, the lead agency has not made a determination regarding whether or not the building is a “historic resource” under CEQA. A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a). The four categories are:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant.⁵ Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § SS5024.1, Title 14 CCR, Section 4852) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a) is considered to be a historical resource unless “the preponderance of evidence demonstrates” that the resource is not historically or culturally significant.”⁶

Correspondence between the City of Chowchilla and the CCHE indicates that the City has not endorsed the findings of the Chowchilla Historic Resources Reconnaissance Survey, however the California State Office of Historic Preservation (OHP) issued a letter on December 16, 2008 commenting on this issue as related to the EIR.⁷ Although received outside of the comment period for the EIR and therefore not addressed in the final EIR, the OHP letter states: “what must occur is a determination by the lead agency as to whether a historical resource for the purposes of CEQA is extant.”⁸ Section 4.2 of the EIR outlines the local significance of the Dodge Brothers Building, but does not clearly state if the City does or does not accept the findings of the Chowchilla Historic Resources Reconnaissance Survey, and therefore does or does not consider the building a historic resource for the purposes of CEQA. In light of the discrepancies between the EIR and subsequent correspondence about the historic status of the Dodge Brothers Garage, we recommend that the building be considered for listing based on the evidence presented in our evaluation, the Chowchilla Historic Resources Reconnaissance Survey, and the recommendation of the Chowchilla Heritage Preservation Commission.

PROPOSED PROJECT

According to the EIR and CCHE grant application, the proposed project includes the deconstruction of the Dodge Brothers Garage, storage of salvaged materials at the City's Public Works Corporation Yard, and subsequent rebuilding (called "reconstruction" in the EIR) on the existing site or one of three identified alternative sites: 1, 2a and 2b. After deconstruction, the Chowchilla Heritage Park/Heritage Center project will be created by reassembling the salvaged materials of the Dodge Brothers Garage in a manner that will replicate the structural and architectural features of the existing building.⁹ The proposed project will potentially enlarge the building to accommodate public and quasi-public activities.

The deconstruction and subsequent reconstruction of the building would require major alterations to the existing building and therefore, the project as a whole (including both deconstruction and reconstruction) will be evaluated according to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Please see the "Final Environmental Impact Report: Re-circulated Draft Focused Environmental Impact Report for the Chowchilla Heritage Center Welcome Center" (dated December 5, 2008) for a more detailed description of the proposed project and its identified potential impacts.

DETERMINATION OF SIGNIFICANT ADVERSE CHANGE UNDER CEQA

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment."¹⁰ Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired."¹¹ The significance of a historic resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance" and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.¹² Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the

change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

COMPLIANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS

The Secretary of the Interior's Standards for Rehabilitating Historic Buildings (the Standards) are the benchmark by which federal agencies and many local government bodies evaluate rehabilitative work on historic properties. The Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Compliance with the Standards does not determine whether a project would cause a substantial adverse change in the significance of a historic resource. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the Standards may or may not cause a substantial adverse change in the significance of a historic resource.

The Standards provide for the preservation, rehabilitation, restoration or reconstruction of a historic property. As affirmed in the December 16, 2008 letter from California State Historic Preservation Officer, Wayne Donaldson, the proposed project does not neatly fall into any of the four categories (Preservation, Rehabilitation, Restoration, or Reconstruction) for evaluation of projects for compliance for the Secretary of the Interior's Standards. In this case, the Standards for Rehabilitation are the most appropriate treatment to apply to the proposed project because they are generally used when a building is undergoing alterations or additions. The National Park Service defines Rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."¹³

The following analysis applies to each of the four proposed alternatives (described in the EIR) for the conversion of the Dodge Brothers Garage into the Chowchilla Heritage

Welcome Center. The primary difference between the preferred alternative (existing site) and alternatives 1, 2a and 2b is site location, which is evaluated under Standards 1, 2, 3, and 9. Therefore, the analysis for the remaining Standards (4, 5, 6, 7, 8, and 10) is applicable to all four alternatives; and the analysis for Standards 1, 2, 3, and 9 follows for each of the four alternatives.

EVALUATION OF THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS: ALL ALTERNATIVES

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

See evaluation under alternative-specific Standards Evaluation.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

See evaluation under alternative-specific Standards Evaluation.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

See evaluation under alternative-specific Standards Evaluation.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

Discussion: There are no changes to the property that have acquired significance in their own right. According to the DPR 523A form completed for the Dodge Brothers Garage, a 50 foot by 53 foot metal framed addition was attached to the rear of the building after the original construction date and was subsequently removed. The existing building reflects the same plan, form, massing and design as originally constructed.

Conclusion: Since the property includes no significant additions that the proposed project might interfere with, the proposed project will comply with Rehabilitation Standard 4.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Discussion: The proposed project includes the deconstruction of the Dodge Brothers Garage, which will affect the distinctive materials, features, finishes, construction techniques, and examples of craftsmanship that characterize the property. Although the proposed project calls for rebuilding on the existing site or at an alternative site, the character of the building's distinctive materials, features, finishes, construction techniques and craftsmanship will be lost, as the deconstruction and subsequent rebuilding will technically result in a new building created with salvaged materials. Although some of the original materials will be salvaged, between thirty and fifty percent of the materials will be lost as a result of this process. The historic materials will be retained and utilized, however, the manner in which the materials were originally configured to create the historic building that currently exists will be irretrievably lost.

Conclusion: The proposed project does not comply with Rehabilitation Standard 5.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Discussion: According to the EIR, between thirty and fifty percent of the building's original materials will be salvaged; however, the EIR does not indicate what will happen to the remaining original materials. No specific measures for the repair of deteriorated features have been outlined as part of the proposed project. Nor have specifications for replacement materials been provided. No indication is given that the proposed project will attempt to repair historic materials or features, instead opting for deconstruction and reconstruction. If deteriorated features are replaced with new materials instead of being repaired, this will result in a significant loss of historic features.

Conclusion: The proposed project does not comply with Rehabilitation Standard 6.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Discussion: The proposed project does not include any chemical or physical treatments of the Dodge Brothers Garage.

Conclusion: The proposed project does comply with Rehabilitation Standard 7.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

Discussion: According to the EIR, “based on a preliminary field reconnaissance by a qualified historic resource professional, there does not appear to be any substantial archaeological resource located on the existing site.”¹⁴ The EIR does not clarify if any archeological resources exist on any of the three alternative sites nor does it describe procedures that will be followed if archeological remains are uncovered during deconstruction or rebuilding on the existing site, or alternative sites. If archeological resources are uncovered during any portion of the proposed project, all construction should be halted and proper mitigation undertaken.

Conclusion: If the proposed project follows the guidelines outlines above, then the proposed project will comply with Rehabilitation Standard 8.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.*

See evaluation under alternative-specific Standards Evaluation

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Discussion: The EIR includes an option that along with the deconstruction and

reconstruction of the Dodge Brothers Garage, “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”¹⁵ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, not does it outline how such additions will be designed. Since the design of such new additions has not been outlined in the EIR, it is unclear if these additions will alter the essential form and integrity of the historic property or its environment. The design for new additions should be outlined in the EIR and should be designed in such a manner that it will meet Standard 10 as outlined above.

Conclusion: The proposed project will not comply with Rehabilitation Standard 10.

EVALUATION OF THE SECRETARY OF THE INTERIOR’S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS: PREFERRED ALTERNATIVE (EXISTING SITE)

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Discussion: The Dodge Brothers Garage will be deconstructed (dismantled) and reconstructed (rebuilt) on the existing site as the Chowchilla Heritage Welcome Center, reusing portions of salvaged materials from the original building. Although the new use is compatible with the historic use, as it showcases the building as part of an initiative to honor the history of the City of Chowchilla, and would not necessarily require drastic changes to materials, features or spaces, the proposed project does entail such changes and would essentially create a new building with markedly different characteristics than those that currently exist.

Conclusion: The proposed project does not comply with Rehabilitation Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

Discussion: The historic character of the Dodge Brothers Garage will be significantly altered as a result of the proposed project. Although the building will be deconstructed and rebuilt in place to appear as if it were a historic building, the result of deconstruction and rebuilding will create a new building, which will not demonstrate the same distinctive materials, features, and spaces as the current building.

Conclusion: The proposed project does not comply with Rehabilitation Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

Discussion: The proposed project will include the deconstruction and rebuilding of the Dodge Brothers Garage in such a manner that may create a false sense of historical development. The resulting building will be designed to look as if it were a historic building, but will essentially be constructed as a new building using new and salvaged materials. The historic character of the original building, including a large portion of the original materials, design, and workmanship will be lost through this process. The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”¹⁶ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, nor does it outline how such additions might be designed. Therefore, it is possible that conjectural features will be added and may contribute to a further sense of false historical development.

Conclusion: The proposed project does not comply with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

See evaluation under All Alternatives above.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

See evaluation under All Alternatives above.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

See evaluation under All Alternatives above.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.*

Discussion: The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”¹⁷ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, not does it outline how such additions will be designed. Therefore, it is unclear if the new construction (if carried out) will be clearly differentiated from the old, or if it will be compatible with the historic materials, features, size, scale, proportion, and massing of the historic building.

In terms of the deconstruction and rebuilding of Dodge Brothers Garage on the existing site, this work will include exterior alterations that will destroy historic materials and features of the property, including the loss of fifty to seventy percent of the original brick.¹⁸ The use of salvaged materials to reconstruct the building will make it difficult to differentiate between new and old materials. These exterior alterations (deconstruction of the Dodge Brothers Garage) will destroy historic materials and features that characterize the property.

Conclusion: The proposed project will not comply with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

See evaluation under All Alternatives above.

Summary

As demonstrated in the preceding analysis, few aspects of the proposed project (Existing Site) conform to the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings*. These actions can be presumed under the CEQA regulations to have a significant adverse impact on the Dodge Brothers Garage and do not meet the Standards.

EVALUATION OF THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS: ALTERNATIVE 1

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Discussion: The Dodge Brothers Garage will be deconstructed (dismantled) and reconstructed (rebuilt) on alternative site 1 as the Chowchilla Heritage Welcome Center, reusing portions of salvaged materials from the original building. Although the new use is compatible with the historic use, as it showcases the building as part of an initiative to honor the history of the City of Chowchilla, and would not necessarily require drastic

changes to materials, features or spaces, the proposed project does entail such changes and would essentially create a new building with markedly different characteristics than what exists currently. Additionally, the new building would be constructed on a new site, which has the potential to seriously alter the spatial relationships the original building had with its surroundings.

Conclusion: The proposed project will not comply with Rehabilitation Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

Discussion: The historic character of the Dodge Brothers Garage will be significantly altered as a result of the proposed project. The building will be deconstructed and rebuilt on alternative site 1, which will significantly alter the distinctive materials, features, spaces, and spatial relationships of the property.

Conclusion: The proposed project does not comply with Rehabilitation Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

Discussion: The proposed project will include the deconstruction and rebuilding of the Dodge Brothers Garage on alternative site 1, which will create a false sense of historical development. The resulting building will be designed to look as if it were a historic building, but will essentially be constructed as a new building using new and salvaged materials on a site with which the building has no historical connection. The historic character of the original building, including a large portion of the original materials and workmanship will be lost through this process. The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”¹⁹ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, nor does it outline how

such additions might be designed. Therefore, it is possible that conjectural features will be added and will contribute further to a false sense of historical development.

Conclusion: The proposed project does not comply with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

See evaluation under All Alternatives above.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

See evaluation under All Alternatives above.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

See evaluation under All Alternatives above.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.*

Discussion: The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”²⁰ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, nor does it outline how such additions will be designed. The use of salvaged materials to reconstruct the building will make it difficult to differentiate between new and old materials. Therefore, it is unclear if the new construction (if carried out) will be clearly differentiated from the old, or if it will be compatible with the historic materials, features, size, scale, proportion, and massing of the historic building.

In terms of the deconstruction and rebuilding of Dodge Brothers Garage on alternative site 1, this work will include exterior alterations that will destroy historic materials, features, and spatial relationships associated with the property, including the loss of fifty to seventy percent of the original brick and major changes to the building’s spatial relationships with the surrounding site.²¹ These exterior alterations (deconstruction of the Dodge Brothers Garage) will destroy historic materials and features that characterize the property.

Conclusion: The proposed project will not comply with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

See evaluation under All Alternatives above.

Summary

As demonstrated in the preceding analysis, few aspects of the proposed project (Alternative 1) conform to the *Secretary of the Interior’s Standards for Rehabilitating Historic Buildings*. These actions can be presumed under the CEQA regulations to have a significant adverse impact on the Dodge Brothers Garage and do not meet the Standards.

EVALUATION OF THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS: ALTERNATIVE 2A

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Discussion: The Dodge Brothers Garage will be deconstructed (dismantled) and reconstructed (rebuilt) on alternative site 2a as the Chowchilla Heritage Welcome Center, reusing portions of salvaged materials from the original building. Although the new use is compatible with the historic use, as it showcases the building as part of an initiative to honor the history of the City of Chowchilla, and would not necessarily require drastic changes to materials, features or spaces, the proposed project does entail such changes and would essentially create a new building with markedly different characteristics than what exists currently. Additionally, the new building would be constructed on a new site, which has the potential to seriously alter the spatial relationships the original building had with its surroundings.

Conclusion: The proposed project will not comply with Rehabilitation Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

Discussion: The historic character of the Dodge Brothers Garage will be significantly altered as a result of the proposed project. The building will be deconstructed and rebuilt on alternative site 2a, which will significantly alter the distinctive materials, features, spaces, and spatial relationships of the property.

Conclusion: The proposed project does not comply with Rehabilitation Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

Discussion: The proposed project will include the deconstruction and rebuilding of the Dodge Brothers Garage on alternative site 2a, which will create a false sense of historical development. The resulting building will be designed to look as if it were a historic building, but will essentially be constructed as a new building using new and salvaged materials on a site with which the building has no historical connection. The historic character of the original building, including a large portion of the original materials and workmanship will be lost through this process. The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”²² This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, nor does it outline how such additions might be designed. Therefore, it is possible that conjectural features will be added and will contribute further to a false sense of historical development.

Conclusion: The proposed project does not comply with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

See evaluation under All Alternatives above.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

See evaluation under All Alternatives above.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

See evaluation under All Alternatives above.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.*

Discussion: The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”²³ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, not does it outline how such additions will be designed. The use of salvaged materials to reconstruct the building will make it difficult to differentiate between new and old materials. Therefore, it is unclear if the new construction (if carried out) will be clearly differentiated from the old, or if it will be compatible with the historic materials, features, size, scale, proportion, and massing of the historic building.

In terms of the deconstruction and rebuilding of Dodge Brothers Garage on alternative site 2a, this work will include exterior alterations that will destroy historic materials, features, and spatial relationships associated with the property, including the loss of fifty to seventy percent of the original brick and major changes to the building’s spatial relationships with the surrounding site.²⁴ These exterior alterations (deconstruction of the Dodge Brothers Garage) will destroy historic materials and features that characterize the property.

Conclusion: The proposed project will not comply with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

See evaluation under All Alternatives above.

Summary

As demonstrated in the preceding analysis, few aspects of the proposed project (Alternative 2a) conform to the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings*. These actions can be presumed under the CEQA regulations to have a significant adverse impact on the Dodge Brothers Garage.

EVALUATION OF THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATING HISTORIC BUILDINGS: ALTERNATIVE 2B

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Discussion: The Dodge Brothers Garage will be deconstructed (dismantled) and reconstructed (rebuilt) on alternative site 2b as the Chowchilla Heritage Welcome Center, reusing portions of salvaged materials from the original building. Although the new use is compatible with the historic use, as it showcases the building as part of an initiative to honor the history of the City of Chowchilla, and would not necessarily require drastic changes to materials, features or spaces, the proposed project does entail such changes and would essentially create a new building with markedly different characteristics than what exists currently. Additionally, the new building would be constructed on a new site, which has the potential to seriously alter the spatial relationships the original building had with its surroundings.

Conclusion: The proposed project will not comply with Rehabilitation Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

Discussion: The historic character of the Dodge Brothers Garage will be significantly altered as a result of the proposed project. The building will be deconstructed and rebuilt on alternative site 2b, which will significantly alter the distinctive materials, features, spaces, and spatial relationships of the property.

Conclusion: The proposed project does not comply with Rehabilitation Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

Discussion: The proposed project will include the deconstruction and rebuilding of the Dodge Brothers Garage on alternative site 2b, which will create a false sense of historical development. The resulting building will be designed to look as if it were a historic building, but will essentially be constructed as a new building using new and salvaged materials on a site with which the building has no historical connection. The historic character of the original building, including a large portion of the original materials and workmanship will be lost through this process. The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”²⁵ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, nor does it outline how such additions might be designed. Therefore, it is possible that conjectural features will be added and will contribute further to a false sense of historical development.

Conclusion: The proposed project does not comply with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

See evaluation under All Alternatives above.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

See evaluation under All Alternatives above.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

See evaluation under All Alternatives above.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

See evaluation under All Alternatives above.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.*

Discussion: The EIR includes an option that “the building will potentially be enlarged to accommodate public and quasi-public activities, and/or retail or service businesses which may include a ‘Welcome Center’.”²⁶ This description provided in the EIR is unclear and does not definitively indicate if new additions will be constructed as part of the proposed project, not does it outline how such additions will be designed. The use of salvaged materials to reconstruct the building will make it difficult to differentiate between new and old materials. Therefore, it is unclear if the new construction (if carried out) will be clearly differentiated from the old, or if it will be compatible with the historic materials, features, size, scale, proportion, and massing of the historic building.

In terms of the deconstruction and rebuilding of Dodge Brothers Garage on alternative site 2b, this work will include exterior alterations that will destroy historic materials, features, and spatial relationships associated with the property, including the loss of fifty to seventy percent of the original brick and major changes to the building's spatial relationships with the surrounding site.²⁷ These exterior alterations (deconstruction of the Dodge Brothers Garage) will destroy historic materials and features that characterize the property.

Conclusion: The proposed project will not comply with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

See evaluation under All Alternatives above.

Summary

As demonstrated in the preceding analysis, few aspects of the proposed project (Alternative 2b) conform to the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings*. These actions can be presumed under the CEQA regulations to have a significant adverse impact on the Dodge Brothers Garage.

EVALUATION CONCLUSION

Page & Turnbull concludes that none of the four alternatives to the proposed project outlined in the EIR conform to the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings* as currently designed. The proposed project is designed in such a way that it will essentially destroy a significant portion of the historic materials, features, and spatial relationships that characterize the existing building, and will therefore cause a substantial adverse change in the significance of a historic resource and have a significant effect on the environment as defined by CEQA.

If the design of the proposed project was modified, the preferred alternative (existing site) is the only one of the four alternatives that could possibly meet the Standards due to

issues of integrity of location and setting. Even then, the project would have to be significantly redesigned so that the building would not be deconstructed, and instead major portions would be retained and rehabilitated in situ. It may be possible to better meet the program needs of the Chowchilla Heritage Welcome Center by enlarging the building through the construction of compatible additions or similar design alternatives that would preserve the historic character of the existing building and meet the Standards.

ENDNOTES

¹ Valley Planning Consultants, Inc. “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008.

² National Register-eligible properties include properties that have been listed on the National Register, and properties that have formally been found eligible for listing.

³ Chowchilla Municipal Code, Title 18, Chapter 18.55.050 (Ord. 418-01, 2001).

⁴ California Office of Historic Preservation, *California Register and National Register: A Comparison* (Technical Assistance Series #6).

⁵ Section 5024.1 (g) of the Public Resources Code reads as follows:

“A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:

- (1) The survey has been or will be included in the State Historic Resources Inventory;
- (2) The survey and the survey documentation were prepared in accordance with office procedures and requirements;
- (3) The resource is evaluated and determined by the office to have a significance rating of Category 1 to 5 on DPR Form 523;
- (4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.”

⁶ Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.

⁷ Letter from Nancy Red (City of Chowchilla) to Mimi Morris (CCHE), dated April 3, 2009: pg. 2.

⁸ Letter from the California Office of Historic Preservation to Mr. Thomas Skinner, dated December 16, 2008.

⁹ Please note that the EIR and project grant application incorrectly uses the term “reconstruction.” According to the Secretary of the Interior’s Standards for the Treatment of Historic Properties, reconstruction is defined as: “the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.” Since the Dodge Brothers Garage is extant, the project is not a true reconstruction according to the above definition.

¹⁰ CEQA Guidelines subsection 15064.5(b).

¹¹ CEQA Guidelines subsection 15064.5(b)(1).

¹² CEQA Guidelines subsection 15064.5(b)(2).

¹³ <http://www.cr.nps.gov/hps/tps/standguide/>

¹⁴ “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008, pg. 4.2-15.

¹⁵ Ibid.

¹⁶ “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008, pg. 3-1.

¹⁷ Ibid.

¹⁸ Correspondence to Mimi Morris from Nancy Red, Re: “Chowchilla Heritage Welcome Center and CCHE Reservation of Funds for Grant Application for ‘Reconstruction’ of Building,” dated April 3, 2009, pg. 2.

¹⁹ “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008, pg. 3-1.

²⁰ Ibid.

²¹ Correspondence to Mimi Morris from Nancy Red, Re: “Chowchilla Heritage Welcome Center and CCHE Reservation of Funds for Grant Application for ‘Reconstruction’ of Building,” dated April 3, 2009, pg. 2.

²² “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008, pg. 3-1.

²³ Ibid.

²⁴ Correspondence to Mimi Morris from Nancy Red, Re: “Chowchilla Heritage Welcome Center and CCHE Reservation of Funds for Grant Application for ‘Reconstruction’ of Building,” dated April 3, 2009, pg. 2.

²⁵ “Recirculated Draft Focused Environmental Impact Report, Chowchilla Heritage Welcome Center Project” October 6, 2008, pg. 3-1.

²⁶ Ibid.

²⁷ Correspondence to Mimi Morris from Nancy Red, Re: “Chowchilla Heritage Welcome Center and CCHE Reservation of Funds for Grant Application for ‘Reconstruction’ of Building,” dated April 3, 2009, pg. 2.